

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KLEIMAR, N.V., : x
Plaintiff, : : ECF CASE
against : :
DALIAN DONGZHAN GROUP CO., LTD. : : 16 CV 9486 (AJN) (DCF)
BENXI BEIYING IRON AND STEEL GROUP : :
IMPORT AND EXPORT CORP. LTD., : : ANSWER OF
BEIGANG HONG KONG LIMITED, and : : GARNISHEE MACSTEEL
BEITAI IRON & STEEL GROUP CO., LTD., : : INTERNATIONAL
Defendants. : : USA CORP. TO
: : SEVENTH SERVED
: : WRIT OF
: : GARNISHMENT BY
: : KLEIMAR, N.V.

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims
of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime
Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served
upon Garnishee MACSTEEL INTERNATIONAL USA CORP. (“MACSTEEL”) on or about
February 17, 2017, Garnishee MACSTEEL hereby states that on such date of service, it was not
indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING
IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG
KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively, “Defendants”),
and did not otherwise have in its possession any property, tangible or intangible, including funds,
assets, cash, good, chattels, credits, effects, debts, owed by or owed to the Defendant(s) or
monies to be paid to discharge a debt owed to the Defendant(s), including monies being
transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York
February 27, 2017

DLA PIPER LLP (US)

By: /s/ Neal Kronley
Kiera S. Gans
kiera.gans@dlapiper.com
Neal F. Kronley
neal.kronley@dlapiper.com
1251 Avenue of the Americas
New York, New York 10020
(212) 335-4500 (phone)
(212) 335-4501 (fax)

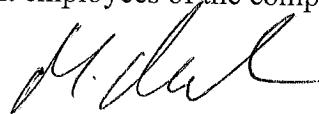
*Attorneys for Garnishee
Macsteel International USA Corp.*

VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

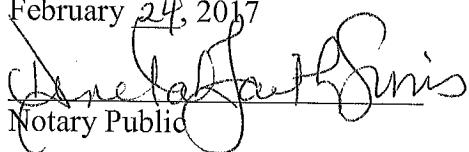
Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO SEVENTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.



Margo Rosner Marks

Sworn to before me on
February 24, 2017



Dinetah Faith Sims
Notary Public



CERTIFICATE OF SERVICE

I, Neal Kronley, hereby certify that on the 27 day of February, 2017, I caused the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO SEVENTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. to be served by ECF and email upon:

Kevin J. Lennon, Esq.
LENNON, MURPHY & PHILLIPS, LLC
420 Lexington Avenue, Suite 300
New York, New York 10170
(212) 490-6050
(212) 490-6070
klennon@lmplaw.net
Counsel for Plaintiff

/s/ Neal Kronley
Neal F. Kronley